UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

August 3, 2010

Reply To: OEA-095

MEMORANDUM

SUBJECT: Review of current groundwater data from the Lakewood Ponders Corner Superfund site to determine if EPA needs to perform a mini-investigation to explain the increases in PCE from MW-16A

FROM: Bernie Zavala, Hydrogeologist, LG, LHG
Office of Environmental Assessment

TO: Chris Cora, Remedial Project Manager
Office of Environmental Cleanup

I did receive your email regarding technical support on the Superfund site Lakewood Ponders Corner. I have in the past had some involvement with this site and I'm familiar with this site. This site is not assigned to me. I did review the information that Guy Barrett, Ecology sent to you and the information that was sent is not complete to make the assessment re: the mini-investigation. Guy Barrett is asking EPA to perform a mini investigation to explain the increases in concentration for MW-16A. The better question to ask has the conceptual site model (CSM) change to explain the increase in MW-16A?

Past & Current CSM for the Lakewood Ponder site:
Source area & Contamination: Dry Cleaners - Plaza Cleaners contamination being chlorinated solvents, PCE found in a septic tank behind the Plaza Cleaners. The dry cleanser is located northeast of the Production Wells H1 &H2 of the Lakewood Water District. See Ecology's Figure 1, Lakewood Plaza Cleaners Sampling Locations and EPA's figure 2.

Geology: The site remediation has been limited to the Vashon Glaciation and within that drift only four geologic units has been impacted by the remediation. The Geologic units for this site starting at the ground surface are the permeable sands and gravels of the recessional outwash deposits (Steilacom gravels). Then the Vashon Till-"B-zone" MW-20B is located in this zone consisting of silt and clay-rich till low permeability. Below

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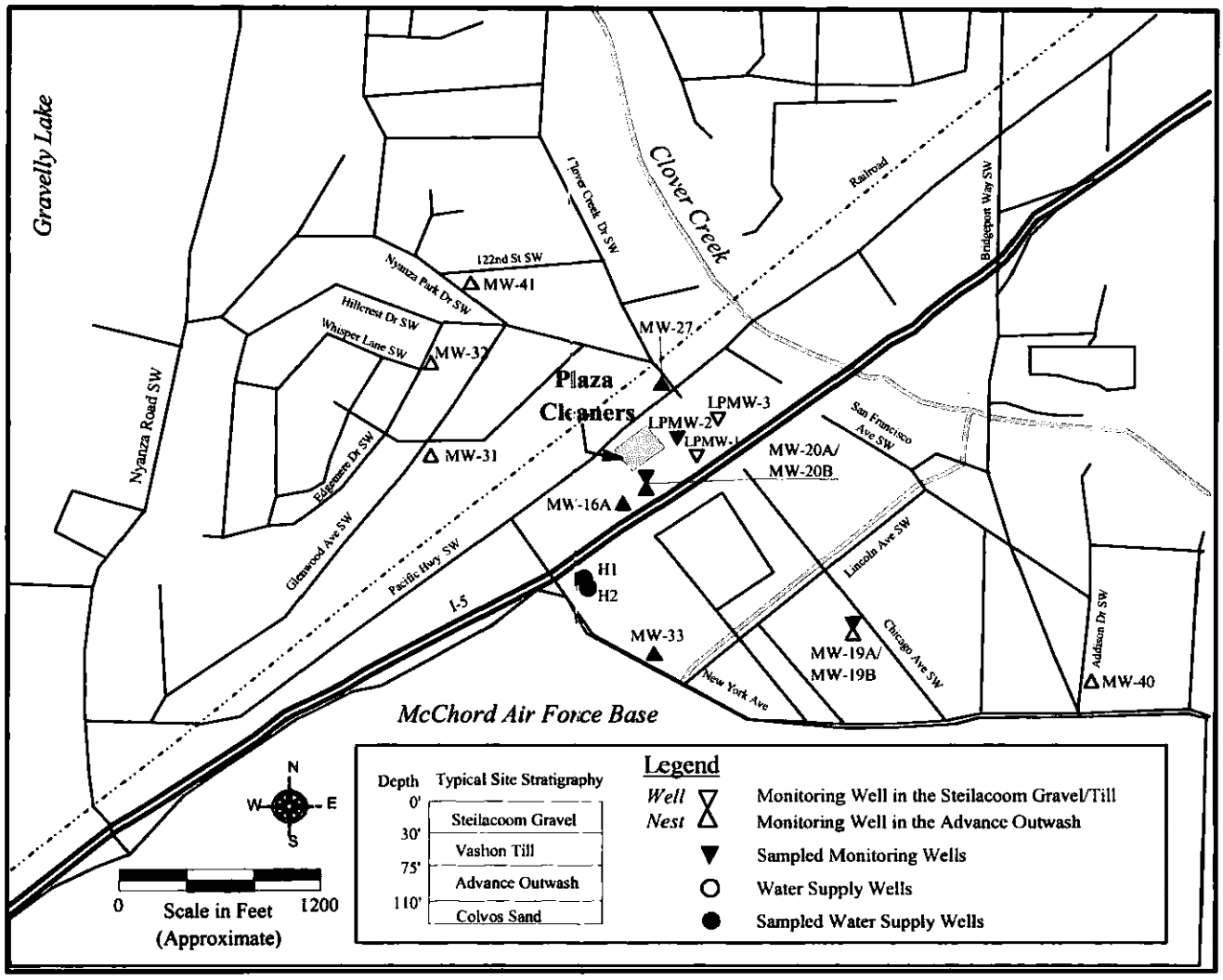
this depth is the "A-zone" a permeable advance outwash deposit, it is the primary aquifer. The production wells H1 and H2 and MW-16A are screened in this zone. See EPA's figure 3 which is a North to South cross-section from the Plaza Cleaners to H1 and H2.

Flow Direction of Groundwater: The conclusions from the RI and an article in the Ground Water Monitoring Review dated, Fall 1983 stated that the wells H1&H2 reverses the groundwater flow direction from the natural flow toward Gravelly Lake in a Northwest direction to the pumping centers of H1&H2. The area that is influence by these wells can be referred to as the zone of contribution. EPA's figure 7 shows a 2-D capture zone based on site specific data. This capture zone graphic was produced by EPA's Wellhead Protection Areas (WHPA) module being RESSQC module. This graphic delineated flow lines to the well screens for H1 & H2 in the "A-zone" or advance Outwash.

Remedial Action: The septic tank was removed and vapor extraction took place at this location to remedy the unsaturated soils. The groundwater as explained above was being captured by H1 and H2 and an air stripping towers were built to remove the volatile Organic Compounds from the groundwater. The Vashon Till has high levels of PCE in the groundwater that has continued to impact the advance outwash aquifer around H1 and H2. Based on data that was forward to EPA from Ecology only monitoring wells 20B and 16A are still being impacted by a secondary source in the Till unit and Wells H1 and H2 are containing and treating the groundwater contamination.

Conclusion: The CSM has not change and as long as Wells H1 and H2 are pumping and treating the groundwater, no change is needed. It appears that a mini-investigation is not needed at this time based on the CSM. The concentrations of PCE in MW-16A are increasing but the source location is understood and the pathways are known and has been cut off through treatment. It would be good to have some additional information on the extraction rates for both H1 & H2 to confirm the hydraulics or the capture area.

Please let me know if you have any questions on the above information.



Ecology's Figure 1 (taken from Guy Barrett, Ecology email dated 7/23/2010)

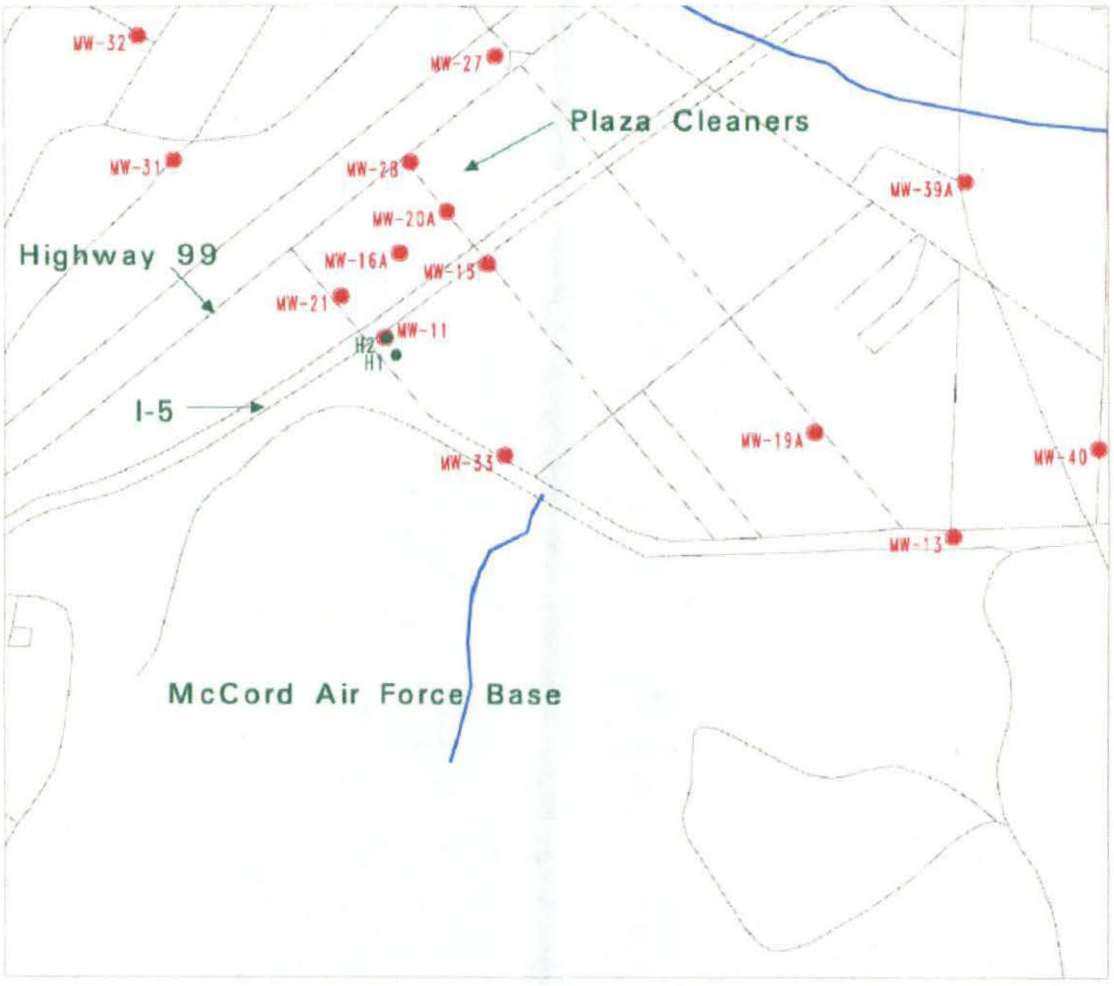


Figure 2 Enlarged Base Map - Lakewood/Ponders Site Monitoring Wells and Lakewood Water District Wells H1 and H2 (Data from EPA Region 10 Monitoring Well Database, Extraction Date: 9/12/94)

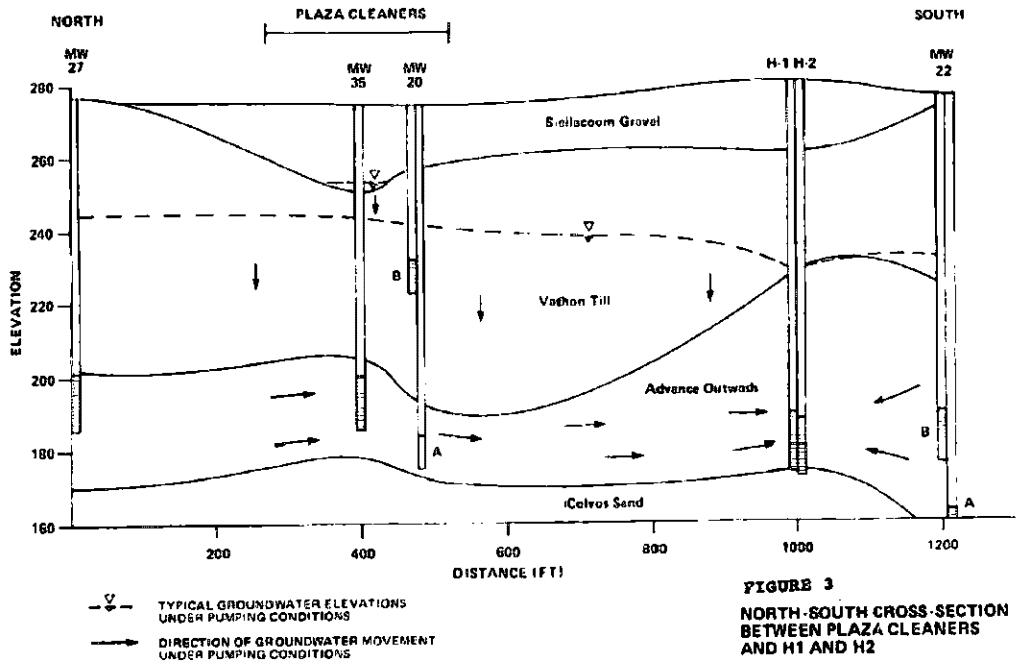


FIGURE 3

NORTH-SOUTH CROSS-SECTION BETWEEN PLAZA CLEANERS AND H1 AND H2

(Adapted from CH2MHill, Pendero Corner Feasibility Study)

1985

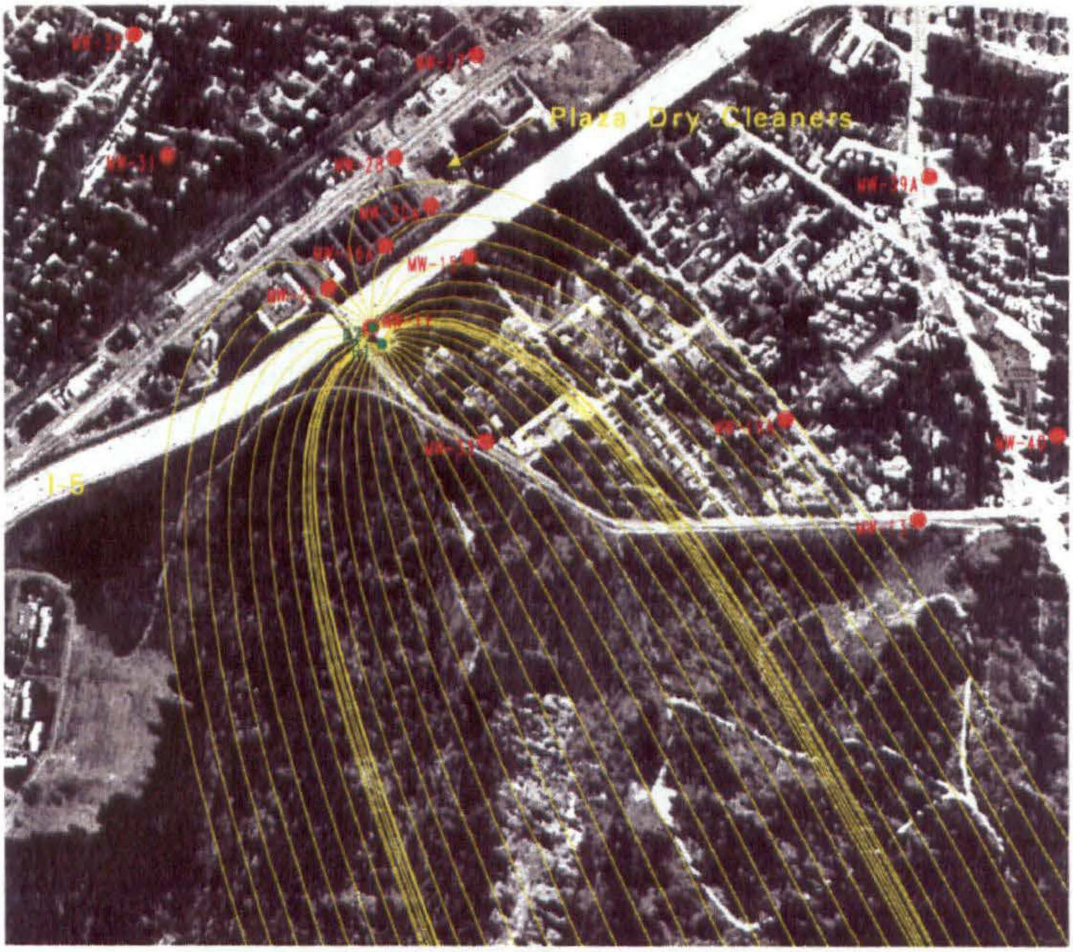


Figure 7 Lakewood/Ponders Corner Site: 11 Year Capture Zones of Lakewood Water District Wells H1 and H2 in Yellow, Monitoring Wells in Red

References

Keely, J.F. and Wolf, F., "Field Applications of Chemical Time-Series Sampling", Ground Water Monitoring Review, Fall 1983.

US Environmental Protection Agency, July 1985, Remedial Investigation and Feasibility Study Ponder's Corner, Washington. EPA 112-OL22. CH2MHill, Bellevue, Washington.

U.S. Environmental Protection Agency, March 1991, A Modular Semi-Analytical Model for the Delineation of Wellhead Protection Areas, version 2.0, WHPA.

Appendix. Summary of Sample Results (ug/L) from January 1991 to June 2010

Well	January 1991			May 1991			November 1991			May 1992			December 1992		
Number	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE
MW-16A	**28**	**1 J**	**2.4 J**	**26**	**0.6 J**	**2**	**2.7 J**	1 U	**0.6 J**	**7**	1 U	**1**	**9 J**	**0.3 J**	**0.8 J**
MW-20A	1 U	1 U	1 U	**0.4 J**	1 U	1 U	**0.4 J**	1 U	1 U	**0.5 J**	1 U	1 U	**0.8 J**	1 UJ	1 UJ
MW-20B	**1100 D**	**18**	**33**	**752**	**16**	**30**	**120**	**2.6 J**	**6.7**	**940**	**13**	**32**	**340 J**	**14 J**	**20 J**
MW-21	**2.1 J**	1 U	**1 J**	**2**	1 U	**0.7 J**	**2.2 J**	1 U	**1.0 J**	**2**	1 U	**0.6 J**	**2**	**0.2 J**	**0.3 J**
MW-27	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 UJ	1 UJ	1 UJ
MW-28A	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-31	**1 J**	1 U	**1.9 J**	**0.6 J**	1 U	**2**	**0.9 J**	1 U	**2.2 J**	**0.8 J**	1 U	**1**	**0.5 J**	1 UJ	**0.9 J**
MW-32	**1 J**	1 U	**1.1 J**	**1**	1 U	**2**	**0.6 J**	1 U	**0.6 J**	**0.7 J**	1 U	**1**	**0.7 J**	1 UJ	**0.5 J**
MW-41	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 UJ	1 UJ	1 UJ
MW-19A	--	--	--	--	--	--	1 U	**0.5 J**	1 U	--	--	--	1 UJ	1 UJ	1 UJ
MW-33	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-40	1 U	1 U	1 U	--	--	--	1 U	1 U	1 U	--	--	--	1 UJ	1 UJ	1 UJ
H1/H2	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Well	May 1993			December 1993			April 1994			November 1994			July 1995		
Number	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE
MW-16A	**44**	10 U	**2 J**	**13**	**0.3 J**	**0.7 J**	**33**	**0.6**	**1.4**	**9.7**	**0.3 J**	**0.5 J**	**27**	**0.5 J**	**0.8 J**
MW-20A	10 U	10 U	10 U	**0.3 J**	1 U	1 U	**0.4**	0.2 U	0.2 U	**0.3 J**	1 U	1 U	**0.4 J**	1 U	1 U
MW-20B	**700 D**	**12**	**21**	**187**	50 U	**8.2 J**	**472**	**8.6 J**	**12.6**	**86**	50 U	**3 J**	**340 D**	**8.4**	**17**
MW-21	**1 J**	10 U	10 U	**1.6**	1 U	**0.4 J**	**1.5**	**0.2 J**	**0.3**	**1.8**	**0.2 J**	**0.3 J**	--	--	--
MW-27	10 U	10 U	10 U	1 U	1 U	1 U	0.2 U	0.2 U	0.2 U	1 U	1 U	1 U	1 U	1 U	1 U
MW-28A	--	--	--	--	--	--	--	--	--	--	--	--	1 U	1 U	1 U
MW-31	10 U	10 U	10 U	**0.8 J**	1 U	**1.2 J**	**0.7**	0.2 U	**1.0**	**0.8 J**	1 U	**1**	**0.6 J**	1 U	**0.5 J**
MW-32	10 U	10 U	10 U	**0.7 J**	1 U	**0.6 J**	**0.7**	0.2 U	**0.6**	**0.6 J**	1 U	**0.5 J**	**0.7 J**	1 U	**0.5 J**
MW-41	10 U	10 U	10 U	1 U	1 U	1 U	0.2 U	0.2 U	0.2 U	1 U	1 U	1 U	1 U	1 U	1 U
MW-19A	--	--	--	1 U	**0.4**	1 U	0.2 U	**0.5**	0.2 U	--	--	--	1 U	**0.4 J**	1 U
MW-33	--	--	--	--	--	--	--	--	--	--	--	--	1 U	1 U	1 U
MW-40	--	--	--	1 U	1 U	1 U	0.2 U	0.2 U	0.2 U	--	--	--	1 U	1 U	1 U
H1/H2	--	--	--	--	--	--	--	--	--	--	--	--	**9**	**0.3 J**	1 U

U = The analyte was not detected at or above the reported result.
J = The analyte was positively identified. The associated numerical result is an estimate.
UJ = The analyte was not detected at or above the reported estimated result.
D = Analysis performed at secondary dilution.
-- = Not tested
Bold = The analyte was positively identified.

Appendix (cont.). Summary of Sample Results (ug/L) from January 1991 to June 2010

Well	January 1996			July 1996			January 1997			July 1997			February 1998		
Number	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE
MW-16A	**47 E**	**0.8 J**	**1.5**	**43**	**0.7 J**	**1.9**	**54**	**1.1**	**3.1**	**47**	**0.7 J**	**2.5**	**36**	**0.7 J**	**2 J**
MW-20A	**0.2 J**	1 U	1 U	**0.4 J**	1 U	1 U	**0.4 J**	1 U	1 U	**0.3 J**	1 U	2 U	**0.4 J**	1 U	1 U
MW-20B	**353**	**7.2**	**15**	**387**	**7.6**	**15**	**373**	100 U	**6.4 J**	**222**	**4**	**6.4**	**456**	**7 J**	**12**
MW-21	--	--	--	Well Decommissioned											
MW-27	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	2 U	1 U	1 U	1 U
MW-28A	1 U	1 U	1 U	Well Decommissioned											
MW-31	**0.6 J**	1 U	**0.7 J**	--	--	--	--	--	--	**0.9 J**	1 U	**0.9 J**	--	--	--
MW-32	**0.8 J**	1 U	**0.6 J**	--	--	--	--	--	--	--	--	--	--	--	--
MW-41	1 U	1 U	1 U	--	--	--	--	--	--	--	--	--	--	--	--
MW-19A	--	--	--	--	--	--	--	--	--	1 U	**0.3 J**	2 U	--	--	--
MW-33	--	--	--	1 U	1 U	1 U	--	--	--	1 U	1 U	2 U	--	--	--
MW-40	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
H1/H2	**8.4**	**0.2 J**	**0.2 J**	**0.14 J**	1 U	1 U	**18**	**0.4 J**	**0.4 J**	**8.8**	**0.3 J**	**0.6 J**	**11**	**0.4 J**	**0.3 J**

Well	July 1998			January 1999			August 1999			January 2000			August 2000		
Number	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE
MW-16A	**30**	1 U	**1.5 J**	--	--	--	**22**	**0.4 J**	**1.1**	**40**	**0.7 J**	**1.9**	**22**	**0.3 J**	**0.7**
MW-20A	**0.6 J**	1 U	1 U	1 U	2 U	1 U	**0.8 J**	2 U	1 U	**0.2 J**	2 U	1 U	**0.1 J**	2 U	1 U
MW-20B	**575 D**	**10**	**23**	**708**	**5.2**	**12**	**722**	**8.4 J**	**16 J**	**184**	**6**	**13**	**648**	200 U	100 U
MW-27	**0.05 J**	1 U	1 U	1 U	2 U	1 U	1 U	2 U	1 U	1 U	2 U	1 U	1 U	2 U	1 U
MW-31	--	--	--	--	--	--	**0.9 J**	2 U	**0.4 J**	--	--	--	--	--	--
MW-32	--	--	--	--	--	--	--	--	--	--	--	--	**0.8 J**	2 U	1 U
MW-41	--	--	--	--	--	--	--	--	--	--	--	--	1 U	2 U	1 U
MW-19A	--	--	--	--	--	--	1 U	**0.4 J**	1 U	--	--	--	--	--	--
MW-33	1 U	1 U	1 U	--	--	--	1 U	2 U	1 U	--	--	--	1 U	2 U	1 U
MW-40	--	--	--	--	--	--	--	--	--	--	--	--	1 U	2 U	1 U
H1/H2	**10**	1 U	**0.1 J**	**1.5**	1 U	1 U	**5.2**	**0.2 J**	1 U	**10**	1 U	1 U	**8.7**	**0.03 J**	1 U

U = The analyte was not detected at or above the reported result.
J = The analyte was positively identified. The associated numerical result is an estimate.
D = Analysis performed at secondary dilution.
E = The concentration of the associated value exceeds the known calibration range.
-- = Not tested
Bold = The analyte was positively identified.

Appendix (cont.). Summary of Sample Results (ug/L) from January 1991 to June 2010

Well Number	January 2001			August 2001			February 2002			August 2002			February 2003		
	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE
MW-16A	**31**	**0.4 J**	**1**	**25**	**0.3 J**	**0.7 J**	**47**	**0.8 J**	**2.3**	**22**	**0.3 J**	**0.8 J**	**59 J**	**0.2 J**	**2.4**
MW-20A	**0.2 J**	1 U	1 U	1 U	2 U	1 U	--	--	--	--	--	--	1 U	1 U	1 U
MW-20B	**493**	**6.6 J**	**12**	**486**	**8.2**	**18**	**248**	200 U	100 U	**371**	**8.5**	**16**	**230**	100 U	100 U
MW-27	1 U	1 U	1 U	1 U	2 U	1 U	1 U	2 U	1 U	1 U	2 U	1 U	1 U	1 U	1 U
MW-31	--	--	--	**0.4 J**	2 U	**0.3 J**	--	--	--	--	--	--	--	--	--
MW-32	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-41	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-19A	--	--	--	1 U	**0.3 J**	1 U	--	--	--	--	--	--	--	--	--
MW-33	--	--	--	1 U	2 U	1 U	--	--	--	1 U	1 U	1 U	--	--	--
MW-40	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
H1/H2	**11**	**0.2 J**	1 U	**6.8**	**0.2 J**	1 U	**12**	**0.2 J**	**0.2 J**	**6.1**	1 U	1 U	**1.3**	1 U	1 U

Well Number	September 2003			June 2004			November 2004			June 2005			November 2005		
	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE
MW-16A	**26**	**0.3 J**	**0.5 J**	**30**	**0.4 J**	**0.8 J**	**48**	1 U	**1.4**	**80.3**	**1.3**	**2.8**	**43**	**0.69 J**	**1.0 J**
MW-20A	**0.1 J**	1 U	1 U	**0.2 J**	1 U	1 U	**0.3 J**	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
MW-20B	**239**	**5.4 J**	**12**	**344**	**6.5 J**	**15**	**241**	**6.7**	**13**	**413**	**6.6**	**12**	**555**	**6.4**	**11**
MW-27	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
MW-31	**0.5 J**	1 U	**0.1 NJ**	--	--	--	--	--	--	**0.53 J**	1 U	1 U	--	--	--
MW-32	--	--	--	--	--	--	--	--	--	**1.4**	1 U	1 U	--	--	--
MW-41	--	--	--	--	--	--	--	--	--	1 U	1 U	1 U	--	--	--
MW-19A	1 U	**0.4 NJ**	1 U	--	--	--	--	--	--	1 U	**0.57 J**	1 U	--	--	--
MW-33	1 U	1 U	1 U	--	--	--	--	--	--	1 U	1 U	1 U	--	--	--
MW-40	--	--	--	--	--	--	--	--	--	1 U	1 U	1 U	--	--	--
H1/H2	**6.4**	**0.2 NJ**	1 U	**7.9**	**0.24 J**	**0.1 J**	**2.6**	1 U	1 U	**14**	**0.31 J**	1 U	**6.4**	1 U	1 U

U = The analyte was not detected at or above the reported result.
J = The analyte was positively identified. The associated numerical result is an estimate.
-- = Not tested
Bold = The analyte was positively identified.

Appendix (cont.). Summary of Sample Results (ug/L) from January 1991 to June 2010

Well	May 2006			September 2006			June 2007			October 2007			May 2008		
Number	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE
MW-16A	**124**	**1.8**	**4.6**	**29**	**0.3 J**	**0.48 J**	**83**	**1.2**	**2.5**	**24**	1 U	**0.64 J**	**55**	**1.2**	**2.8**
MW-20A	1 U	1 U	1 U	1 U	1 U	1 U	2 U	2 U	2 U	2 U	1 U	1 U	1 U	1 U	1 U
MW-20B	**216**	**4.2**	**6.6**	**518**	**5.6**	**11**	**204**	**4.4**	**7.8**	**491**	**7.5**	**15**	**143**	**5.5**	**12**
MW-27	1 U	1 U	1 U	1 U	1 U	1 U	2 U	2 U	2 U	2 U	1 U	1 U	1 U	1 U	1 U
MW-31	--	--	--	--	--	--	**1.6 J**	2 U	2 U	--	--	--	--	--	--
MW-32	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-41	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-19A	--	--	--	--	--	--	2 U	**1.2 J**	2 U	--	--	--	--	--	--
MW-33	1 U	1 U	1 U	--	--	--	2 U	2 U	2 U	--	--	--	1 U	1 U	1 U
MW-40	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
LPMW-2	**9.9**	1 U	1 U	--	--	--	**4.8**	1 U	1 U	--	--	--	**2.5**	1 U	1 U
LPMW-3	1 U	1 U	1 U	--	--	--	2 U	1 U	1 U	--	--	--	--	--	--
H1/H2	**7.3**	**0.22 J**	1 U	**4.8**	1 U	1 U	**5.2**	2 U	2 U	**3.8**	1 U	1 U	**9.6**	1 U	1 U

Well	October 2008			June 2009			November 2009			June 2010		
Number	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE	PCE	TCE	cis-1,2-DCE
MW-16A	**31**	**0.45 J**	**0.6 J**	**67**	**0.94 J**	**2.2**	**28**	**0.52 J**	**0.83 J**	**85**	**1.3**	**1.6**
MW-20A	1 U	1 U	1 U	1 U	1 U	1 U	**0.64 J**	1 U	1 U	1 U	1 U	1 U
MW-20B	**258**	**4.5**	**9**	**160**	**4.1**	**7.4**	**250**	**4.7**	**9.6**	**130**	**3.7**	**6.3**
MW-27	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
MW-31	--	--	--	--	--	--	--	--	--	--	--	--
MW-32	--	--	--	--	--	--	--	--	--	**1.8**	1 U	1 U
MW-41	--	--	--	--	--	--	--	--	--	1 U	1 U	1 U
MW-19A	--	--	--	1 U	1 U	1 U	--	--	--	--	--	--
MW-33	--	--	--	1 U	1 U	1 U	--	--	--	1 U	1 U	1 U
MW-40	--	--	--	--	--	--	--	--	--	--	--	--
LPMW-2	--	--	--	**4.1**	1 U	1 U	**11**	1 U	1 U	**4.4**	1 U	1 U
H1/H2	**5.1**	1 U	1 U	**6.8**	1 U	1 U	--	--	--	**4.3**	1 U	1 U

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-- = Not tested

Bold = The analyte was positively identified.